

**COMMENTS ON
EXIDE DUST CONTROL PLAN
FACILITY DEMOLITION
November 16, 2012**

GENERAL COMMENTS

This Plan is too vague and general to afford an opportunity for meaningful comment. Much more detail regarding specific circumstances at the plant needs to be supplied before this Plan will be viable. In general, the plan calls for "the use of water trucks with a spray bar and spray hoses." However, among many other deficiencies, there appears to be no consideration of the large volumes of contaminated water that these practices will produce and management of the resulting contaminated runoff. This aspect needs to be addressed in great detail to avoid exacerbating contaminant releases from the site.

Who ultimately will oversee compliance with this Plan? Reports will be sent to the TCEQ, but will TCEQ be verifying, or effectively verifying, that activities are being performed according to the Plan? If so, will TCEQ be able to do so quickly enough to be able to effectively change things if they are not being done appropriately?

Such oversight concerns also underscore the need for public access to data. It appears that the public will ultimately have to serve as watchdog on this, and they simply cannot do that effectively if the data are not made available within a timely fashion (or even at all). Accordingly, the Plan needs to address in detail how the public will have access to relevant data and monitor the activities.

SPECIFIC COMMENTS

Page 1, ¶2. The Plan states that "best management practices (BMPs) will be implemented throughout the project." This includes "wetting active demolition areas," but does not specify how often. It includes "minimizing or ceasing activity during periods of high wind (greater than 20 miles per hour)," but does not specify why this wind speed was chosen and provides no justification for omitting such measures at lower wind speeds. The Plan also does not specify how often "sweeping or wetting paved areas, [and] wetting of paved areas" will occur. In addition, there is no information as to where, and under what circumstances, "dust suppressant materials" will be used. Given the unpredictability and variability of weather and other site conditions, routine schedules should be implemented regardless of weather conditions or monitoring results (which could be over 2 days after the monitoring). In general, then, much greater detail is necessary before this "Plan" can be taken seriously.

Page 4, ¶3.0, Table 2. Nowhere is it mentioned that the facility should be sprayed/wetted *prior to* initiation of demolition activities. It is important that dust suppression measures be implemented prior to commencement of demolition activities so that dust suppression measures don't commence after a problem already has been created.

Page 4, ¶3.0, Table 2. Why are stockpiles to be covered only when wind speed exceeds 20 miles per hour? Are there not significant fugitive emissions at wind speeds below that, including wind speeds only a mile or two less?

Page 4, ¶3.1.1. In connection with “Particulate Take Action Levels,” why is there testing only for PM₁₀ concentrations? From the standpoint of protecting public health, testing also should be done for PM_{2.5} concentrations.

Page 5, ¶3.1.2. This section on “Particulate Stop Work Levels” omits reference to the 30-minute PM₁₀ concentrations for purposes of work stoppages. A 30-minute standard is used for the “Particulate Take Action Levels,” and so it also should be added as a criterion here in addition to 60-minute concentration.

Page 5, ¶3.1.2. The first sentence in this section makes reference to Table 2 of the Air Monitoring Plan, but there is no such table 2.

Page 5, ¶3.2, second paragraph. The first sentence should note that dust suppression measures must be implemented both *prior to* and during facility demolition activities. Similarly, water trucks must be filled and available *prior to* and during demolition activities. In addition, the airborne dust wet suppression system should always be activated during active facility demolition periods, not just “as required.” The “as required” qualification is too vague and subjective.

Page 5, ¶3.2, last paragraph. Bulk load out or loose salvage or waste material should always be pre-wetted or sprayed. The Plan says only that those measures “may” be taken.

Page 6, ¶3.3, last paragraph. Off road travel should take place on unimproved roads only when they have been adequately wetted in advance. Paved roads must be wetted as well. In addition, the Plan should specify what the “normal maintenance schedule by Exide staff” is. It could well be too infrequent (quite possible given the high ambient monitoring data historically measured).

Page 7, ¶3.7. Stockpiles also should be covered during rain events to protect them from becoming sources of contaminated storm water runoff? The 10-foot limit is excessive. Stockpiles (at their highest point) should be no higher than 8 feet to facilitate ground-level access. In addition, there needs to be a reasonable lateral extent for stockpiles.